

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
_____X

UNITED STATES OF AMERICA,

Plaintiff,

—Against—

LEV PARNAS,

Defendant.
_____X

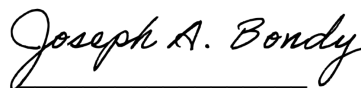
Case No. (S-1) 16-CR-725 (JPO)

NOTICE OF
MOTION

JOSEPH A. BONDY, an attorney duly licensed to practice law before this Court, hereby moves for an Order:

1. Dismissing the Indictment due to selective prosecution;
2. Dismissing the Indictment under the Fifth and Sixth Amendments, due to grand jury defects;
3. Severing Counts;
4. Ordering production of all *Brady* and *Giglio* materials forthwith;
5. Granting Joinder in Co-Defendant's Motions, to the extent not in conflict with Mr. Parnas's defense;
6. Granting Reservation of Rights to bring additional motions based upon newly available or discovered evidence;
7. Any such other relief that is necessary and proper.

Dated: New York, New York
December 1, 2020



Joseph A. Bondy
Counsel to Lev Parnas